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6 *Attorneys for Philippe Schaad  
 and Shooting Gallery Publications, LLC*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 LAWRENCE J. SEMENZA II; ROMIE  
 SEMENZA; LAWRENCE J. SEMENZA,  
 LTD; PHILIPPE SCHAAD; SHOOTING  
 GALLERY PUBLICATIONS, LLC; TESLA,  
 INC.,

16 Defendants.

Case No.: 2:22-cv-02059-APG-DJA

**STIPULATION AND ORDER FOR  
 EXTENSION OF JOINT PRETRIAL  
 ORDER DEADLINE**

**(SECOND REQUEST)**

18 Pursuant to Local Rules IA 6-1 and LR IA 6-2 Plaintiff the United States of America  
 19 ("Plaintiff"), Defendants Philippe Schaad, and Shooting Gallery Publications, LLC  
 20 ("Defendants") (collectively the "Parties"), by and through their respective undersigned counsel  
 21 of record, hereby stipulate and agree:

22 1. On May 16, 2025, the Court entered an order resolving the Parties' dispositive  
 motions. (Dkt. 76).

24 2. On July 13, 2025, the Court granted the Parties stipulation to extend the deadline  
 to file the joint pretrial order from June 16, 2025, to July 30, 2025. The Parties requested  
 additional time based on discussions surrounding potential resolution, the recent passing of Mrs.  
 Semenza, and the logistics regarding determination of whether Mr. Schaad and/or Mr. Semenza  
 anticipated appearing in person for trial as they both reside in Portugal. (Dkt. 78).

1       3. Since the prior request, the Parties have explored resolution, discussed trial  
2 availability of counsel and witnesses, and have exchanged a draft of the joint pretrial order.  
3 However, the Parties are working to finalize proposed trial exhibits, any objections and/or  
4 stipulations to the same. The Parties are diligently working together to finalize each side's  
5 proposed trial exhibits, determining whether any exhibits can be stipulated too, and each side's  
6 objections to the same. The Parties respectfully request a slight two-week extension so they can  
7 finalize proposed trial exhibits and the joint pretrial order.

8       4. For the above reasons, and for good cause shown, the Parties request, the current  
9 deadline to file the joint pretrial order be extended from July 30, 2025 to August 13, 2025.

10 5. This stipulation is being entered into good faith and not for the purposes of delay.

DATED this 28th day of July, 2025.

DATED this 28th day of July, 2025.

MCMENEMY HOLMES PLLC

U.S. DEPT. OF JUSTICE, TAX DIVISION

14 By: /s/ Dustun H. Holmes  
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17 *Attorneys for Philippe Schaad  
and Shooting Gallery Publications, LLC*

*Attorneys for the United States*

## **IT IS SO ORDERED:**

UNITED STATES MAGIS

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**UNITED STATES MAGISTRATE JUDGE**

DATED: 7/29/2025